

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

PRISCILLA PARKER, PATRICK PARKER,  
BARRY AMAR-HOOVER, MATTEO  
MARCHETTI, ZACHARY MILLER  
CORRADINO, SAMANTHA TAYLOR  
REYES, CHRISTOPHER SALOMAN, and  
MICHAEL STRAUSS, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiffs,

v.

REALPAGE, INC.; AMLI MANAGEMENT  
COMPANY; ALLIANCE RESIDENTIAL  
COMPANY; APARTMENT MANAGEMENT  
CONSULTANTS, LLC; ASSET LIVING, LLC;  
AVALONBAY COMMUNITIES, INC.; AVENUE5  
RESIDENTIAL LLC; BELL PARTNERS, INC.; BH  
MANAGEMENT SERVICES, LLC; BOZZUTO  
MANAGEMENT COMPANY; THE BOZZUTO  
GROUP; CAMDEN PROPERTY TRUST; CONAM  
MANAGEMENT CORP.; CORTLAND  
PARTNERS, LLC; CORTLAND PROPERTIES,  
INC.; CUSHMAN & WAKEFIELD, INC.; EQUITY  
RESIDENTIAL; ESSEX PROPERTY TRUST; FPI  
MANAGEMENT, INC.; GREYSTAR REAL  
ESTATE PARTNERS, LLC; HIGHMARK  
RESIDENTIAL, LLC; LANTOWER LUXURY  
LIVING, LLC; LINCOLN PROPERTY  
COMPANY; MID-AMERICA APARTMENT  
COMMUNITIES, INC.; MORGAN PROPERTIES;  
PINNACLE PROPERTY MANAGEMENT  
SERVICES, LLC; RPM LIVING, LLC; SECURITY  
PROPERTIES, INC.; THOMA BRAVO, L.P.;  
THRIVE COMMUNITIES MANAGEMENT, LLC;  
UDR, INC.; WINNCOMPANIES LLC; and ZRS  
MANAGEMENT, LLC.

Defendants.

Case No. 1:23-cv-20160

**JOINT STATUS REPORT**

Pursuant to the Court's Orders (ECF Nos. 32 and 50), the parties jointly submit this status report to advise the Court of the decision by the Judicial Panel on Multidistrict Litigation (the "Panel" or "JPML") on the motion to transfer the four cases<sup>1</sup> consolidated on this docket (the "Florida Actions") and related cases.

On April 10, 2023, the Panel issued an order transferring twenty actions to the Middle District of Tennessee before the Honorable Waverly D. Crenshaw, Jr., for "coordinated or consolidated pre-trial proceedings." *In re: RealPage, Inc., Rental Software Antitrust Litigation (No. II)*, MDL 3071, ECF No. 205. The Florida Actions were filed after Defendants filed their transfer motion with the JPML, and, as such, were noticed as potential tag-along actions. *In re: RealPage, Inc.*, ECF Nos. 12, 157, and 191. Accordingly, the Florida Actions were not included in the Panel's April 10, 2023 order. On April 12, 2023, pursuant to Panel Rule 7.1, the Clerk of the Panel entered a Conditional Transfer Order ("CTO"), transferring twelve actions, including all four Florida Actions, to the Middle District of Tennessee. If unopposed, the Clerk of the Panel is anticipated to transmit the transfer orders to the Middle District of Tennessee by April 19, 2023 (seven days after entry of the CTO), at which point the transfer orders will become effective. The parties are not aware of any opposition to the CTO.

In making this joint status report, Defendants do not waive, in this or any other action, any (i) defenses or arguments for dismissal that may be available under Fed. R. Civ. P. 12; (ii) affirmative defenses under Fed. R. Civ. P. 8, including defenses based on class action waivers; (iii) other statutory or common law defenses that may be available; or (iv) right to seek or oppose any reassignment, transfer, or consolidated alternatives, including to seek arbitration. Defendants

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<sup>1</sup> *Corradino, et al. v. RealPage, Inc., et al.*, No. 1:23-cv-20165 (S.D. Fla.); *Marchetti v. RealPage, Inc., et al.*, No. 1:23-cv-20263 (S.D. Fla.); *Parker, et al. v. RealPage, Inc., et al.*, No. 1:23-cv-20160 (S.D. Fla.); *Saloman, et al. v. RealPage, Inc., et al.*, No. 1:23-cv-21038 (S.D. Fla.).

expressly reserve their rights to raise any such defenses (or any other defense) in response to either the Complaint or any original, amended, or consolidated complaint that may be filed in this or any other action.

Dated this 14th day of April 2023.

Presented by:

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

DATED this 14th day of April, 2023.

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